

EXHIBIT 8

EXHIBIT 8

DECLARATION OF JONNICA BOWEN

I, Jonnica Bowen, do hereby declare, under penalty of perjury, the following:

1. I am a Washoe County Library System Branch Manager for the North Valleys Library in Reno, Nevada. I am one of the named defendants in *Ribar v. Washoe County, NV, et al.*, District of Nevada case number 3:24-cv-0052-ART-CSD. I am being represented by the Washoe County District Attorney's Office.

2. The Library serves a very diverse population. As a Branch Manager, I have participated in many different types of Library events, including the RainbowFest events.

3. RainbowFest events were held to celebrate LGBTQIA Pride, providing a fun Library-centered community event with books, arts and crafts, music, food, stories and fun. The events also included Drag Story Hour programs, where a drag performer reads approved children's books to children and their parents.

2023 RainbowFest – Sparks Library

4. On July 15, 2023, I was present at the Sparks Library for the RainbowFest event. The Children's Area in the Library is always reserved only for children and their parents, and it remained so during the Rainbowfest event. A sign was located at the entrance of that area notifying visitors of this policy. In addition, the Drag Story Hour Program was reserved for children and one parent, and required pre-reserved wristband tickets. On page 2 of the PDF file titled "Photos of 2023-2024 Rainbow Fest Signs," bates stamped WC0767 is a true and accurate depiction of the signs placed inside the Sparks Library near the Children's Area and Drag Story Hour program during the 2023 RainbowFest event on July 15, 2023.

5. Inside the Library during the event, Ribar approached me pointing his hand-held tripod camera toward me and interrupted a conversation I was having with security guards regarding a disruptive attendee. Ribar questioned whether we were going to trespass the individual, and I responded that we were having a private conversation. Ribar argued with me, telling me "It's a public discussion 'cause you're paid with public money."

1 6. The PDF file titled “Screenshot of Ribar- 2023 Rainbow Fest” is a true and accurate
2 depiction of Ribar’s appearance at the 2023 Sparks Library RainbowFest, including with
3 his tripod hand-held camera.

4 **2024 RainbowFest – North Valleys Library**

5 7. The following year, on June 15, 2024, during Pride Month, the Library hosted
6 another RainbowFest event at the North Valleys Library. I was present and working this
7 event. At that time, I was the Branch Manager for the North Valleys Library.

8 8. The Rainbowfest program included a ticketed Drag Story Hour. The building for
9 the Library was closed, except for the Drag Story Hour program. This was to protect the
10 safety of attendees and prevent disruptions to the programming.

11 9. For the 2024 RainbowFest event at the North Valleys Library, the Library building
12 was closed for the day except for the Drag Story Hour program. A sign was placed on the
13 door notifying the public that most Library services were not available. We also had
14 signage inside the Library prior to the event notifying the public that the Library would be
15 closed, and providing information as to what Library services would be available. We
16 published other notices advertising the event that also informed the public that the Library
17 would be unavailable.

18 10. On page 1 of the PDF file titled “Photos of 2023-2024 Rainbow Fest Signs,” bates
19 stamped WC0766 is a true and accurate depiction of the sign placed on the door of the
20 North Valleys Library during the 2024 RainbowFest event on June 15, 2024.

21 11. Even though the main Library area was closed, we had a separate entrance open as
22 a “cooling off” area. The area provided attendees with an air-conditioned space, cold
23 water, and restrooms. The “cooling off” area’s entrance was about fifteen feet from the
24 main Library entrance, and clearly identified as open during the event.

25 12. We also had a bookmobile in the event outdoor space, which is a large van with
26 various Library materials available to pick up book holds. This was an alternative method
27 to deliver Library books, which allowed the public with Library cards to check out books

1 previously reserved. It also has the ability to distribute Library cards to those who do not
2 have them, and return Library materials.

3 13. At the event, I observed Ribar attending and filming one of his self-proclaimed
4 “First Amendment Audits” using his hand-held tripod with camera attached and a
5 bodyworn camera on his chest.

6 14. Ribar first approached me during the event while I was explaining to two
7 individuals that the Library building was closed for the day. I explained to them, in Ribar’s
8 presence, that “Library services are available throughout Washoe County. We have twelve
9 locations and we also have the bookmobile here today [in the parking lot]. So we’re happy
10 to offer those services to anyone...” One of the individuals responded, in Ribar’s presence,
11 acknowledging that the Library was closed that day.

12 15. I was in the process of handling possible trespasses for other disruptive attendees.
13 Ribar interrupted staff while discussing how to effectuate the process, threatening to sue,
14 and describing his belief regarding the First Amendment.

15 16. When handling a different trespass for another disruptive attendee, I told security
16 staff I would disengage and let them handle the actual trespass. Ribar approached me and
17 began to interrogate me, stating “You’re trespassing people. What’s your name and what
18 do you do for the Library?” In response, I stated, “Sir, if you’re going to be filming like that
19 and interviewing people I need you to go over there [the First Amendment zone].” Ribar
20 was not passively filming the event or staff operations, but was interrupting people and
21 using a loud voice to ask antagonistic questions. This presented as protest behavior, and it
22 disrupted the event and staff’s job duties. Ribar proceeded to cite case law, and threaten to
23 sue me. I told him, “I have no comment for you.” Ribar continued to antagonize and
24 repeat questions toward me, despite my continued response that I had no comment.

25 17. Reno Police Department (“RPD”) Officers were called because a trespassed
26 individual was refusing to leave. I was trying to speak with them regarding the issues,
27 security needs, and assist in their investigation. Ribar approached us, holding his arm with

1 the hand-held tripod up over us to record us. This interrupted the conversation, because an
2 RPD Officer had to ask him to back up—that he could record them, but he needed to back
3 up. When he was asked to back up, rather than simply complying, Ribar interrogated the
4 RPD Officer. He asked the RPD Officer whether she was in danger of “officer safety,” and
5 attempted to quote Nevada law to verbally argue with them. This interfered with my ability
6 to speak to law enforcement for their investigation, causing a disruption and delay.

7 18. While I was still speaking with the RPD Officers, Ribar verbally interrupted us. He
8 loudly asked, “Are you guys aware of what Article 1 Section 9 of the Nevada Constitution
9 states?” An RPD Officer explained, “So right now, we’re going to talk to the reporting
10 party who called us and then we will talk to you.” This again interfered with my ability to
11 speak to law enforcement for their investigation, causing a disruption and delay, and it took
12 me a few seconds to gather my thoughts to remember where I was in the conversation with
13 the Officer.

14 19. The RPD Officers and I walked closer to the trespass subjects, and Ribar followed
15 us. While I was describing which individuals were the subject of certain acts for the
16 Officers, Ribar approached us and caused another disruption. The RPD Officer had to stop
17 and tell Ribar, “So like I said, I don’t care if you record me, but you keep stepping closer
18 and closer to me...” Ribar cut her off and argued that he was far enough away. The Officer
19 explained it was for her safety, and Ribar argued with her about his distance from us. This
20 was the third disruption that Ribar caused while I was simply trying to handle a safety issue
21 at the event with law enforcement.

22 20. In a fourth disruption with the RPD Officers minutes later, the other Officer again
23 asked Ribar, “Can you please step back?” Ribar argued that he was standing back, and the
24 Officer told him, “You keep pulling forward.” Ribar again argued about his distance. The
25 RPD Officer told Ribar, “You are interrupting our investigation.” Ribar argued, “I’m not
26 even saying anything.” The Officer told him that he keeps stepping forward, and the other
27 Officer reiterated that he can record all he wants, but he needed to maintain a distance for

1 their safety. Ribar argued that he does not have weapons, and the RPD Officer explained
2 that he has hands and feet, which can both be weapons, and for their safety they are asking
3 him to maintain a distance. This interrupted me from providing information to the
4 Officers, disrupted my train of thought and made it difficult to ensure that I was providing
5 the Officers with all relevant information.

6 21. In a fifth disruption with the RPD Officers, Ribar was walking around and
7 interrupted my conversation with them, loudly declaring "I'm still staying the same
8 distance." Ribar then engaged in a back-and-forth with an Officer. This again interfered
9 with my ability to speak with law enforcement.

10 22. Later after police left, I was walking outside the Library entrance and overheard
11 Ribar loudly talking at a security guard regarding the Library's closure and his belief that it
12 was discrimination. I approached to assess the situation.

13 23. Ribar approached me and started to interrogate me, holding his hand-held camera
14 tripod out toward my face. The PDF file titled "Screenshot of Ribar- 2024 Rainbow Fest"
15 contained a true and accurate reflection of myself at the 2024 North Valleys Library
16 RainbowFest event, with a true and accurate depiction of Ribar holding his camera out
17 toward me as reflected in the mirrored windows.

18 24. Ribar loudly asked me, "So who are we discriminating against here? Who's allowed
19 to enter the Library?" I responded, "I have no comment." He responded, "So you won't
20 tell me who's allowed to enter the Library?" I again said, "I have no comment, sir." He
21 then loudly said, "So, I can't enter the Library, is it because I'm a white man? Is it because
22 of the color of my skin? Hang on..." In an aggressive tone Ribar said to me, "So who's
23 allowed to enter the Library?" I calmly told him, "I have no comment, sir." He asked, "Do
24 you have to be invited to enter the public library," and again I told him "I have no
25 comment." Ribar, in what felt like an antagonistic tone, said, "Well, why would you?
26 Hang on a second here."

27 //

1 25. After briefly saying a few words to another person, Ribar turned to me and loudly
2 said, "If I'm elderly, got grey hair, and I don't have children, I'm not allowed access to the
3 public library?" I calmly told him, "Nobody has said that to you." Ribar continued to
4 interrogate me, and I explained there was a special event that day with ticketing
5 requirements, and that the event is for children and their parents. He continued to argue
6 that the Library was "discriminating." Ribar loudly and condescendingly asked me, "...so
7 why don't you have transsexuals reading to the elderly? Why don't we do that?" I stated,
8 "sir, I have no comment." Ribar continued to antagonize me, stating "so do we not do
9 transsexuals reading to homeless?" Ribar continued, stating to me, "so do we not do
10 transsexuals reading to the sick?" Throughout, I continued to respond, "I have no
11 comment."

12 26. Assistant Director Stacy McKenzie approached us, asked if he was already
13 trespassed, and stated, "I don't want to trespass you, I really don't. We just really need
14 you to keep the peace." To this, Ribar began arguing that he was keeping the peace, raised
15 his voice, and continued to interrogate me and anyone who would listen regarding the
16 Library's hours and the terms of the Drag Story Hour event. He shouted, "Answer my
17 questions. Who is allowed to go in the Library? What age restrictions are on the Library?"
18 After I attempted to answer Ribar's questions, Ribar continued to interrogate me and Stacy
19 McKenzie with the same questions. When Stacy McKenzie repeatedly told him she had
20 answered his questions and she was not going to answer more, Ribar was argumentative
21 saying "Because you don't like the answer because you know it's a discriminatory action
22 that you're engaged in and you're violating the Constitution of the United States of
23 Nevada." She responded, "Sir, I'm not going to engage with you." I said, "We have
24 already explained everything to you... we're done." Stacy McKenzie told him that this was
25 harassment. Ribar continued to loudly argue with us, shouting "No. It's not harassment.
26 This is exercising freedom of speech because I'm NOT blocking-" Stacy McKenzie
27 interrupted him asked him to go to the protest area, and said "You're preventing us from

1 doing our job.” Ribar spoke over her, and said “ You can disengage with me any time you
2 want and walk away.” He appeared to be attempting to elicit responses from staff by
3 persistently asking the same questions over and over, using a condescending tone, and
4 refusing to simply disengage with staff. I walked away from them.

5 27. I felt that Ribar was attempting to frustrate me and illicit a heightened response for
6 his camera footage, because he was persistent in questioning me despite me telling him I
7 had no comment. It felt like he was trying to provoke me, and it was extremely stressful.

8 28. Ribar later approached me asking several times about the fire code in relation to the
9 locked doors. I told him “we have no comment,” and he continued to talk at me, further
10 disrupting me.

11 29. The PDF file titled “June 15 2024 North Valleys Incident Report by Jonnica
12 Bowen,” bates stamped WC0008-19 is a true and correct copy of the report I created for
13 Library Incident Report regarding the incident with Drew Ribar and other disruptive
14 attendees on June 15, 2024 during the RainbowFest event at the North Valleys Library.

15
16 /s/ Jonnica Bowen
17 JONNICA BOWEN
18
19
20
21
22
23
24
25
26
27